UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

ROBERT M. EATON,))
Plaintiff,))
v.))
TOWN OF TOWNSEND, JAMES M. KREIDLER, JR. & GORDON CLARK,) Civil Action No.: 1:18-CV-11824))
Defendants.	Consolidated with
ROBERT M. EATON,))
Plaintiff,) Civil Action No.: 4:20-CV-40094)
v.))
CINDY KING & CAROLYN SMART,))
Defendants.)

PLAINTIFF'S ASSENTED-TO MOTION TO EXTEND DEADLINE TO FILE REDACTED OPPOSITIONS TO THE DEFENDANTS' SUMMARY JUDGMENT PLEADINGS ON PUBLIC DOCKET

NOW COMES the Plaintiff, Robert M. Eaton (the "Plaintiff"), by and through counsel, and with the assent of the Defendants, Town of Townsend, James M. Kreidler, Jr., Cindy King, Gordon Clark, and Carolyn Smart (hereinafter jointly the "Defendants"), and hereby move to extend the time to file redacted copies of his oppositions to the summary judgment pleadings by ten (10) days to October 11, 2021 due to the unforeseen circumstances discussed below. In support of this Motion, the Plaintiff states as follows:

1. On August 16, 2021, the Defendants filed under seal four separate motions for summary judgment and supporting documents, including many exhibits.

- 2. Pursuant to the Court's August 4, 2021 ruling on the Parties' Joint Motion to Seal the Summary Judgment pleadings, the Parties began to confer regarding the materials to be filed on the public docket, including necessary redactions of the pleadings and exhibits;
- 3. Due to an unusually busy schedule this month and the legal arguments raised in Defendants' multiple Motion papers, counsel for the Plaintiff is requesting an extension to confer with opposing counsel and file redacted copies of the oppositions to the summary judgment pleadings up to and including October 11, 2021;
- 4. Counsel for the Plaintiff and counsel for the Town of Townsend, Kreidler, King, and Smart were informed of the untimely passing of Attorney Harrington, counsel for Gordon Clark, on August 25, 2021.
- 5. Although Attorney Maglione previously entered her appearance for Gordon Clark on this matter, Attorney Harrington has been primarily involved, particularly with respect to issues related to the Stipulated Protective Order and redaction of the Summary Judgment pleadings.
- 6. Attorney Maglione and counsel for the other Parties have agreed to work cooperatively to comply with the Court's Order regarding the filing of redacted Summary Judgment pleadings on the public docket, however, given the unfortunate and unexpected circumstances, extra time is necessary to confer as to what is needed to be redacted.
 - 7. Defendants' counsel has assented to this Motion.

WHEREFORE, the Plaintiff respectfully requests this Honorable Court allow this Motion to extend the deadline to file redacted copies of his oppositions to the summary judgment pleadings by ten (10) days to October 11, 2021.

Respectfull	y	submitted,

Plaintiff, ROBERT M. EATON, By his attorneys,

L. Richard LeClair, III (BBO # 561650)

lrl@leclairlaw.com

Guy A. Sergi, (BBO # 704322)

gsergi@leclairlaw.com LeClair & LeClair, P.C.

707 Main Street

Waltham, MA 02451 TELE: (781) 893-5655 FAX: (781) 647-9346 Respectfully assented-to,

Defendants, TOWN OF TOWNSEND, JAMES M. KREIDLER, JR., CINDY KING & CAROLYN SMART, By their attorneys,

Jul with gowsin

Gareth W. Notis (BBO# 637814) // gnotis@morrisonmahoney.com
Francesca L. Cone (BBO# 697272) fcone@morrisonmahoney.com
MORRISON MAHONEY LLP

250 Summer Street Boston, MA 02210 TELE: (617) 439-7500 FAX: (617) 342-4821

> Respectfully assented-to, Defendant Gordon Clark,

By his attorney,

Christine A. Maglione, Esq. (BBO#600210)

Harrington & Rice, P.C.

738 Main Street Hingham, MA 02043 (781) 385-7230

cam@harringtonrice.com

Date: September 28, 2021

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on September 28, 2021.

/s/ Guy Sergi		